

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NORTH CAROLINA
SOUTHERN DIVISION**

BRENT NIX, individually and on behalf of all others
similarly situated,

Plaintiff,

v.

THE CHEMOURS COMPANY FC, LLC, THE
CHEMOURS COMPANY, E.I. DUPONT de
NEMOURS AND COMPANY, INC., E.I.
DUPONT CHEMICAL CORPORATION, ELLIS
H. MCGAUGHY, and MICHAEL E. JOHNSON,

Defendants.

Civil Action No. 7:17-CV-00189-D

ROGER MORTON, individually and on behalf of
all others similarly situated,

Plaintiff,

v.

THE CHEMOURS COMPANY FC, LLC, THE
CHEMOURS COMPANY, E.I. DUPONT de
NEMOURS AND COMPANY, INC., E.I.
DUPONT CHEMICAL CORPORATION, ELLIS
H. MCGAUGHY, AND MICHAEL E. JOHNSON,

Defendants.

Civil Action No. 7:17-CV-00197-D

VICTORIA CAREY, MARIE BURRIS,
MICHAEL KISER, and BRENT NIX,
individually and on behalf of all others similarly
situated,

Plaintiffs,

v.

E.I. DUPONT de NEMOURS AND COMPANY
and THE CHEMOURS COMPANY FC, LLC,

Defendants.

Civil Action No. 7:17-CV-00201-D

**DECLARATION OF ALLEN J. HERNANDEZ IN SUPPORT OF
PLAINTIFFS' OPPOSITION TO DEFENDANTS'
MOTION FOR CLASS DECERTIFICATION**

1. My name is Allen Hernandez. I am an attorney at Susman Godfrey, LLP, representing Plaintiffs and the Classes in the above-captioned matter. I submit this declaration in support of Plaintiffs' Opposition to Defendants' Motion for Class Decertification. I have personal knowledge of the matters stated herein based on my involvement in and review of documents in this litigation. If called as a witness, I could and would testify competently to such facts under oath.

2. Defendants' Motion for Class Decertification (the "Motion") cites documents produced in this litigation. The Motion also cites other pleadings that, in turn, cite documents produced in this litigation.

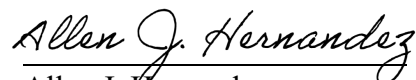
3. The following documents, cited in the Motion or in pleadings cited in the Motion, were produced to Defendants on **July 16, 2020**: NIXPLTF_000709, NIXPLTF_000709-000728, NIXPLTF_000726-000728, NIXPLTF_000759, NIXPLTF_000788, NIXPLTF_000796-000801, NIXPLTF_000805-000807, NIXPLTF_000827, NIXPLTF_000869, NIXPLTF_000899, NIXPLTF_000899-000915, NIXPLTF_000935, NIXPLTF_000935-000951, NIXPLTF_000971, NIXPLTF_000971-000987, NIXPLTF_001018, NIXPLTF_001053, NIXPLTF_001121, NIXPLTF_001121-001131, NIXPLTF_001147, NIXPLTF_001147-001165, NIXPLTF_001149-001150, NIXPLTF_001198, NIXPLTF_001198-001216, NIXPLTF_001200-001201, NIXPLTF_001249, NIXPLTF_001249-1268, NIXPLTF_001266-001268, NIXPLTF_001294, NIXPLTF_001294-001310, NIXPLTF_001340, NIXPLTF_001340-001358, NIXPLTF_001342-001343, NIXPLTF_001395, NIXPLTF_001395-001411, NIXPLTF_001469, NIXPLTF_001469-001485, NIXPLTF_001515, NIXPLTF_001515-001534, NIXPLTF_001529-001531, NIXPLTF_001569, NIXPLTF_001569-001591, NIXPLTF_001583-001585, NIXPLTF_001612,

NIXPLTF_001612–001628, NIXPLTF_001645, NIXPLTF_001645–001655, NIXPLTF_001671, NIXPLTF_001671–001687, NIXPLTF_001704, NIXPLTF_001704–001720, NIXPLTF_001735.

4. The following documents, cited in the Motion or in pleadings cited in the Motion, were produced to Defendants on **March 22, 2021**: NIXPLTF_002035, NIXPLTF_002035–002051, NIXPLTF_002068, NIXPLTF_002068–002084, NIXPLTF_002068–002100, NIXPLTF_002101, NIXPLTF_002101–002129, NIXPLTF_002103–002129, NIXPLTF_002146, NIXPLTF_002146–002168, NIXPLTF_002152–002153, NIXPLTF_002154–002156, NIXPLTF_002196, NIXPLTF_002196–002215, NIXPLTF_002213–002215, NIXPLTF_002241, NIXPLTF_002241–002257, NIXPLTF_002274, NIXPLTF_002307, NIXPLTF_002339, NIXPLTF_002371, NIXPLTF_002407, NIXPLTF_002407–002426, NIXPLTF_002443, NIXPLTF_002443–002459, NIXPLTF_002443–002484.

5. The following documents, cited in the Motion or in pleadings cited in the Motion, were produced to Defendants on **October 19, 2021**: NIXPLTF_003826–003827, NIXPLTF_003831–003838.

Executed in Harris County, State of Texas, on the 17th day of January, 2025.


Allen J. Hernandez